SUPPORTING STATEMENT
AIRCRAFT OPERATOR SECURITY
49 C.F.R. Part 1544

1652-0003

1. *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. (Annotate the CFR parts/sections affected).*

   The Aviation and Transportation Security Act of 2001 (ATSA), Public Law 107-71, 115 Stat. 597, November 19, 2001, transferred the responsibility for civil aviation security from the Federal Aviation Administration (FAA) to the Transportation Security Administration (TSA). In February 2002, TSA implemented its aircraft operator security standards regulations through 49 CFR part 1544, while FAA's legacy regulation covering this portion of aviation security, 14 CFR part 108, was repealed. The information collection required by part 1544 remains critical in the aftermath of the terrorist attacks of September 11, 2001.

   Further, the security program requires the aircraft operators to maintain certain records and to provide certain information to TSA or make it available for inspection. It is those records that are the focal point for this information collection. Specifics are discussed in Question 12.

2. *Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

   Part 1544 requires affected aircraft operators to adopt and implement a TSA-approved security program. These programs require the aircraft operators to maintain and update records to ensure compliance with security provisions outlined in part 1544. Although the Federal government has taken responsibility for many aspects of airport and aircraft security, these programs serve as a vital link in the "system of systems" that comprise modern aviation security and are used by aircraft operators to implement the most current and effective security measures. These programs require that on a per-flight basis, aircraft operators compare passenger manifests against the TSA watch lists and report any matches to TSA. These passenger watch list checks currently conducted by aircraft operators will be taken over by TSA's Secure Flight program by August of 2010. Under this program, TSA will conduct the checks for the aircraft operators, which will reduce their burden as described in this ICR (see OMB control number 1652-0046).

   TSA Principal Security Inspectors (PSI) and Transportation Security Inspectors (TSI) frequently review these records to ensure that the safety and security of the public is not compromised and, when necessary, take corrective enforcement action. In addition, as mandated by 49 U.S.C. 44936, part 1544 requires flight crew members and employees who have unescorted access authority or who perform screening, checked baggage, or cargo

functions to submit to a criminal history records check (CHRC) by submitting personally identifiable information. Such inspections protect the security of the passengers, baggage, cargo, and aircraft.

3. ***Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.***

Aircraft operators have the latitude and flexibility to maintain the required information in a manner that best meets their particular operational needs, to include electronic maintenance. Thus, this collection is in compliance with the Government Paperwork Elimination Act (GPEA) for record keeping; electronic signatures are not applicable to this program. It is estimated that 70% of aircraft operators currently maintain these records electronically. Instruction sheets for each collection will be provided to each site's designated official because it is sensitive in nature.

Additionally, a portion of the collection of information is of immediate importance and TSA must handle via telephonic communication. These are limited instances, but at times TSA needs immediate personal contact with aircraft operators to address issues pertaining to the vetting of passengers, crew members, and other aircraft operator personnel. The urgency pertains to whether or not an individual (passenger or aircraft operator employee, including a crewmember) matches a U.S. watch list and will be permitted to enter or depart from the United States. In light of fiscal concerns, it is to the aircraft operator's advantage to have that decision made prior to the carrier entering and departing U.S. airspace.

4. ***Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2 above.***

Prior to TSA's existence, this information collection was conducted by the Federal Aviation Administration. To TSA's knowledge, since the responsibility for this collection transferred to TSA, it has not been duplicated anywhere else.

Under transportation security statutes and regulations, airports and aircraft operators perform CHRCs on individuals with unescorted access to secure areas. (49 U.S.C. § 44936; 49 CFR §§ 1542.209, 1544.229-230.)   Pursuant to statute and regulation, individuals who have convictions for certain crimes within the preceding 10 years are not eligible for unescorted access to the airport secure areas.

Similarly, pursuant to regulation, CBP requires CHRCs of individuals with unescorted access to CBP's designated airport Federal Inspection Service area (FIS). (10 CFR §§122.182-183.) Some individuals working at the airport may need access to the airport secure areas regulated by TSA and the FIS area controlled by CBP. Because a CHRC would be required by both

agencies for the same applicant, it would be optimal and consistent with the government's view that applicants' fingerprints and associated FBI fees should be collected once rather than twice, and any resulting rap sheets shared among the airport and CBP where the applicant is seeking access.

In an effort to minimize any duplicate collections, the TSA continually strives to work with and identify other entities who have a need to know the information in performance of their official duties pursuant to the Privacy Act, 5 USC § 552a(b)(1), in an effort to reduce redundancy of information collection processes.

5. ***If the collection of information has a significant impact on a substantial number of small businesses or other small entities (Item 5 of the Paperwork Reduction Act submission form), describe the methods used to minimize burden.***

The amount of information required by this collection is proportional to the size of each aircraft operator's organization and therefore does not create a significant impact on a substantial number of small businesses.

6. ***Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.***

TSA has the responsibility of ensuring the security of persons and property traveling within, to, and from the United States. Title 49 CFR part 1544 requires aircraft operators seeking to provide air travel within, into, or out of the United States to adopt and implement an aircraft operator security program.

It is imperative that all aircraft operators provide adequate security measures for all flights within, to, and from the United States. Due to potential security threats and ever changing security risks and assessments, it is necessary to require aircraft operators to perform certain security measures, which may involve maintaining records and providing information to TSA. TSA conveys the needed security measures to the aircraft operators via mechanisms provided within the aircraft operator security program, including issuing Security Directives (SDs) when appropriate.

Aircraft operators are provided, via the regulation, an opportunity to indicate when they cannot meet such requirements due to the uniqueness of their operation. Further, aircraft operator s may provide to TSA an alternate means by which they can meet the intent of the required TSA security measures. TSA handles such requests on a case-by-case basis.

Shortly after September 11, 2001, several Government agencies developed listings of individuals believed to be a threat to civil aviation security. The lists are now created by the Terrorist Screening Center (TSC). The listings, collectively known as the watch lists,

provide names and identifying data about these particular individuals. TSA provides the lists to aircraft operators so that they will vet their passengers to ensure that no one on the list may fly within, to, or from the United States or that appropriate security measures are applied for a passenger on a watch list. These lists are updated on a regular basis. The requirement now encompasses vetting of the entire flight crew, other aircraft operator personnel, and all passengers. The passenger watch list checks currently conducted by aircraft operators will be taken over by TSA's Secure Flight program. Under this program, TSA will conduct the checks for the aircraft operators, which will reduce their burden as described in this ICR (see OMB control number 1652-0046).

If this collection was not conducted, TSA would not be in compliance with its statutory mandate and the security of our aircraft operators would be compromised. The collected information is subject to review during the TSA inspection process. Additionally, if the information to conduct CHRCs was not required, aircraft operator employees who were convicted of disqualifying criminal offenses deemed threatening to aviation security could gain access to secured areas of an airport or obtain security-sensitive positions.

7. ***Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5(d)(2).***

5 CFR 1320.5(d)(2)(i): Unless the agency is able to demonstrate, in its submission for OMB clearance, that such characteristic of the collection of information is necessary to satisfy statutory requirements or other substantial need, OMB will not approve a collection of information—

Requiring respondents to report information to the agency more often than quarterly.

Note: Until Secure Flight is fully operational, aircraft operators are required to conduct a comparison of their passengers against the TSA No Fly and Selectee Lists and report any matches to TSA. On average, this list is updated on a daily basis. This is done on a flight-by-flight basis, depending for each flight on whether there is a potential match. See ICR (OMB Control Number 1652-0046)

Thus, in the interest of transportation security, aircraft operators may need to notify TSA more often than quarterly, on a flight-by-flight basis. Additionally, aircraft search checklists – training record keeping requirements – cargo-related record keeping, and No Fly List and Selectee List matches are also required to be reported to TSA in the interest of aviation security and trend analysis.

5 CFR 1320.5(d)(2)(iv): Unless the agency is able to demonstrate, in its submission for OMB clearance, that such characteristic of the collection of information is necessary to satisfy statutory requirements or other substantial need, OMB will not approve a collection of information—

(iv) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;

Note: In the interest of transportation security, aircraft operators must maintain records of compliance associated with the security program requirements and related federal regulations indefinitely.

Otherwise, the collection is conducted in accordance with 5 CFR 1320.5(d)(2).

8. ***Describe efforts to consult persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the <u>Federal Register</u> of the agency's notice, required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.***

    TSA is in continuous dialogue with aircraft operator stakeholders and public comments were sought via 60 day notice in the <u>Federal</u> <u>Register</u> on March 16, 2010 75 FR 12559) and a 30 day notice on May 26, 2010, 75 FR 29569; TSA received no comments..

9. ***Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.***

    TSA will not provide any payment or gift to respondents.

10. ***Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.***

    TSA does not provide any assurances of confidentiality. Information provided by individuals will be protected from disclosure to the extent appropriate under the applicable provisions of the Freedom of Information Act and the Privacy Act of 1974. Personally identifying information will be collected and transmitted in accordance with the Privacy Act. However, to the extent that the information collected is Sensitive Security Information (SSI) as defined in 49 CFR part 1520, "Protection of Sensitive Security Information," such information is protected from public disclosure.

11. *Provide additional justification for any questions of sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.*

TSA will not ask any questions of a sensitive or private nature.

12. *Provide estimates of hour burden of the collection of information.*

Currently, 801 aircraft operators conduct passenger operations covered under 49 CFR part 1544. Approximately 71 aircraft operators have regularly scheduled flights and maintain a full security program (AOSSP), and 730 have on-demand charter businesses or operate flights under twelve thousand pounds (PCSSP or TFSSP). TSA estimates approximately five new start-up AOSSP aircraft operators annually.

The 66 respondents listed in the previous Information Collection Request (ICR) submission represent airlines holding a full Aircraft operator Standard Security Program (AOSSP). These aircraft operators generally provide scheduled passenger service and public charter service and tend to be larger companies.

In addition to these respondents, 730 additional aircraft operators who hold either a Twelve-Five Standard Security Program (TFSSP) or a Private Charter Standard Security Program (PCSSP) are subject to TSA regulations. These aircraft operators typically provide on-demand air service and tend to be smaller companies.

49 CFR Part 1544 also governs recordkeeping requirements for aircraft operators holding a full All-Cargo Standard Security Program; however, their hour burden has been separately reported under OMB control number 1652-0040.

Table 1: Respondent Summary

Respondent Category	Average Unique Annual Respondents
AOSSP operators	71
TFSSP/PCSSP operators	730
Total	**801**

TSA has identified eight separate information collections under this ICR. These collections will affect an estimated average of 801 unique respondents annually over the three years of the PRA analysis. Collectively, these eight information collections represent an estimated average annual hour burden of 1,883,371 hours. The burden depends on the frequency of flights the aircraft operator has within, to, and from the United States. The hour burden estimates are broken out by category below.

AOSSP Population and Hour Burden Estimate

The AOSSP hour burden estimate is comprised of maintaining security programs, CHRC applications, maintaining records of compliance, and watchlist matching. TSA estimates an average annual total hour burden of 1,653,316 to AOSSP operators.

Table 2: AOSSP Hour Burden Estimate

Information Collection	Average Annual Responses	Hour Burden per response	Total Annual Hour Burden
Security Programs			
New	5	120	600
Updates	71	4	284
Amendments	284	1	284
Requests to change	120	1	120
CHRC Applications	73,840	0.5	36,920
Recordkeeping			
Security Programs	71	4	284
CHRCs	71	520	36,920
Training	71	24	1,704
Other	71	520	36,920
Watchlist			
Matching	769,200,000	0.002	1,538,400
Matches	220	4	880
Total			**1,653,316**

Security Programs

New
TSA estimates approximately five new start-up operators annually. These start-up aircraft operators will use the Aircraft Operator Standard Security Program (AOSSP), which takes approximately 120 hours to complete. The average annual hour burden for new security programs is estimated to be 600 hours (5 operators × 120 hours).

Updates
TSA estimate the time burden associated with security program updates to be an average of 4 hours per update. The average annual hour burden for AOSSP security program updates is estimated to be 284 hours (71 operators × 4 hours).

Amendments
If safety and the public interest require an amendment, TSA or the aircraft operator may require an amendment via email to the TSA-approved security program. TSA considered the

average number of aircraft operator amendments between 2006 and 2009 to estimate four amendments per year. Each of the aircraft operators would be required to respond for each amendment, at an estimated one hour per amendment. TSA estimates an annual burden of 284 hours (71 operators × 4 amendments × 1 hour).

Request to Change
An aircraft operator may submit a request to TSA, specifically to a TSA Principal Security ==Inspectors via email==, to change its TSA-approved security program or to adopt other means to meet the TSA-issued amendments. Based on past requests, TSA estimates it will receive 120 requests annually. TSA estimates one hour to prepare documentation for each request, for an annual burden of 120 hours (120 requests × 1 hour).

Criminal History Records Check (CHRC) Applications

TSA requires the aircraft operators to collect information from employees that the Federal Bureau of Investigation (FBI) needs to conduct a CHRC. The aircraft operator is required to collect information from prospective employees that contain the following information as required by 49 CFR 1544.229 and 1544.230: ID verification, the 28 disqualifying crimes, signature verification, fingerprint disposition from the FBI, and for those who do not perform electronic fingerprint submission, fingerprint cards which are required recordkeeping. The information passes through TSA, goes to the FBI, and the FBI returns any rap sheets that correspond to the biographic info we submitted. TSA posts those rap sheets on a secure web board that the aircraft operators then access, in order to adjudicate the results based on a list of disqualifying criminal offenses.

Each CHRC takes roughly 30 minutes. TSA estimates a typical AOSSP operator will work on approximately 1,040 per year (20 per week × 52 weeks). The annual hour burden associated with this recordkeeping is 36,920 hours (71 operators × 1,040 CHRCs, × 30 minutes).

Recordkeeping

Security Programs
Upon request of TSA, each aircraft operator must provide evidence of compliance with 49 CFR Part 1544 and its security program, including copies of records. Accordingly, TSA estimates that an average of four hours is required for each aircraft operator to maintain copies (hard copies at corporate offices and electronic copies maintained at stations) and to make their security programs available for annual review. TSA estimates an annual burden of approximately 284 hours (71 operators × 4 hours).

CHRCs

Based on data provided by the American Association of Airport Executives (AAAE), TSA estimates AOSSP aircraft operators devote approximately 10 hours per week, or 520 hours per year, to recordkeeping associated with CHRCs. TSA estimates an annual burden of approximately 36,920 hours (71 operators × 520 hours).

Training

Aircraft operators are required by their security programs to provide their crewmembers and other individuals performing security-related functions with initial training and recurrent training covering a number of subjects. Depending on the subject matter, the training is delivered in several methods such as web-based training, classroom training, hands on training, and home study. The aircraft operators must retain the records for varying specified periods of time. TSA estimates that the average annual hour burden per carrier associated with this recordkeeping requirement is 24 hours, resulting in an annual burden of 1,704 hours (71 operators × 24 hours).

Other Recordkeeping

Based on data provided by AAAE, TSA estimates AOSSP aircraft operators devote approximately 10 hours per week, or 520 hours per year, for other required recordkeeping under 49 CFR Part 1544. TSA estimates an annual burden of 36,920 hours (71 operators × 520 hours).

Watchlist

Matching

Aircraft operators devote considerable time to comparing passenger names to watch lists distributed by TSA. While TSA directs aircraft operators to conduct these checks, it does not specify how they are to do so. Consequently, aircraft operators employ diverse methods to perform these checks, resulting in varying hour burdens. Aircraft operators are required to report tentative matches and confirmed matches to the watch lists. TSA was able to estimate the hour burden for a single aircraft operator. TSA used the data from this one major aircraft operator as a proxy for the remaining AOSSP respondents. As a result, the annual hour burden calculated below may or may not be an accurate reflection of the actual annual burden experienced by respondents.

The largest commercial aircraft operators incorporate the updated TSA watch lists into their computer reservation systems (CRS), which occurs on a daily basis. Based on interviews with aircraft operators, TSA estimates this process takes approximately three hours per day. The CRS then compares passenger names to names in the watch lists and returns possible matches to a team of airline employees who review these "hits." The size of such staffs again varies between airlines, but one major airline maintains 15 people on duty 24-hours per day. TSA assumes the required reporting of any confirmed or tentative matches to TSA is included in the duties and hour burden of the airline staff. Thus, the respondent airline devotes 131,400 (15 staff × 24 hours/day × 365 days/year) + 1,095 (3 hours/day × 365 days/year) = 132,495 hours per year to watch list matching. Dividing this annual hourly

burden by the airline's fiscal year 2007 enplanements yields a per-enplanement hourly burden of 0.002 hours per enplanement for watch list matching.

TSA multiplies the 0.002 hours per enplanement by the total number of enplanements in 2009 (769.2m). Thus, TSA estimates an annual burden of approximately 1,538,400 hours (0.002 hours × 769,200,000 enplanements).

Matches
It takes an average of four hours to determine if a match has been made. TSA estimates approximately 220 watch list matches annually, for an annual burden of approximately 880 hours (220 matches × 4 hours).

NOTE: The passenger watch list checks currently conducted by aircraft operators will be taken over by TSA's Secure Flight program. Under this program, TSA will conduct the checks for the aircraft operators, which will significantly reduce their burden as it is described in this ICR (see TSA OMB control number 1652-0046).

Incident and Suspicious Activity Reporting

TSA requires aircraft operators to immediately report to the Transportation Security Operations Center (TSOC) all incidents, suspicious activities, and threats that could affect the security of U.S. civil aviation.

TFSSP/PCSSP Population and Hour Burden Estimate

As stated above, approximately 730 aircraft operators hold either a Twelve-Five Standard Security Program (TFSSP) or a Private Charter Standard Security Program (PCSSP). The TFSSP/PCSSP hour burden estimate is comprised of maintaining security programs, CHRC applications, maintaining records of compliance, and watchlist matching. TSA estimates an average annual total hour burden of 230,055to TFSSP/PCSSP operators

Table 3: TFSSP/PCSSP Hour Burden Estimate

Information Collection	Average Annual Responses	Hour Burden per response	Total Annual Hour Burden
Security Program Amendments	1,460	8	11,680
CHRC Applications	1,500	0.5	750
Recordkeepking (incl. filing CHRC, training, etc.)	1,500	0.083	125
Watchlist Matching	2,610,000	0.083	217,500
Total			**230,055**

Security Programs
Corresponding to the scope of their operations, TSA has established less burdensome security program requirements for TFSSP and PCSSP aircraft operators. On average, these

respondents only incur a recordkeeping burden when they need to amend their security programs. TSA estimates each amendment requires eight hours of operator time and that operators process two amendments per year, resulting in an estimated annual burden of 11,680 hours (730 operators × 2 amendments × 8 hours).

<u>CHRC Applications</u>
TSA estimates approximately 1,500 employees will need CHRCs each year for this group of respondents. The length of time required to process and adjudicate each CHRC would require each respondent in this category to spend approximately 30 minutes of time per employee. TSA estimates an annual burden of approximately 750 hours (1,500 employees × 30 minutes).

<u>Recordkeeping</u>
All TFSSP and PCSSP operators are required to maintain records of compliance. TSA estimates a recordkeeping burden of five minutes annually per employee who is required to have a CHRC to file security programs, training records, CHRC records, and other records of compliance. TSA estimates an annual burden of approximately 125 hours (1,500 employees × 5 minutes).

<u>Watchlist Matching</u>
Like the AOSSP respondents, these operators must compare passenger names to TSA's watch lists. Again, actual hour burdens vary widely across the industry. TSA estimates aircraft operator security coordinators spend an average of five minutes per passenger on the watch list process. This estimate accounts for the time to download the watch list, compare passenger names to names in the lists, and adjudicate any potential matches. TSA has previously estimated that these respondents carry approximately 2.61 million passengers per year, resulting in an annual hour burden of 217,500 hours (2.61 million passengers × 5 minutes).

Total Burden Estimate

TSA estimates the 71 AOSSP aircraft operators devote approximately 1,653,316 hours per year to maintain their security programs, perform CHRCs, maintain records of compliance, and match and adjudicate names against the watchlist.

TSA estimates the 730 TFSSP and PCSSP aircraft operators devote approximately 230,055 hours per year to conduct TSA watch list comparisons and report matches to TSA, perform CHRCs, maintain their security programs, maintain records of compliance.

Table 4: Total AOSSP, TFSSP, and PCSSP Hour Burden Estimate

Information Collection	Total Annual Hour Burden
AOSSP	1,653,316
TFSSP/PCSSP	230,055
Total	**1,883,371**

Together, TSA estimates the 801 respondents have an average annual hour burden of 1,883,371 hours. As discussed previously, TSA's estimates of the annual hour burden for respondents to compare passengers to the watch lists are based on very limited data and may or may not accurately reflect the actual burden on the industry.

13. *Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.*

Separate from the hour burden estimates provided in Item 13 on page 1, aircraft operators incur other costs resulting from the collection of information. Fees for the fingerprinting required by a CHRC range from $29 to $75 if the operator uses National Aviation Trades Association (NATA) fingerprinting services. TSA uses an average fee of $52.

Information Collection	Annual Responses	Cost Burden per response	Total Annual Cost Burden
AOSSP CHRC Fees	73,840	$52.00	$3,839,680
TFSSP/PCSSP CHRC Fees	1,500	$52.00	$78,000
Total			**$3,917,680**

TSA estimated each AOSSP operator will require an average of 1,040 new CHRCs for employees annually. (20 CHRCs per week × 52 weeks). Based on an average fee of $52, the average annual cost to process CHRCs for respondents holding an AOSSP will be approximately $3,839,680 (71 operators × 1,040 CHRCs × $52).

TSA estimates approximately 1,500 employees will need CHRCs each year for TFSSP/PCSSP respondents. Based on an average fee of $52 for fingerprinting required by a CHRC, TSA estimates the average annual cost to respondents holding a PCSSP or TFSSP to process CHRCs will be approximately $78,000 (1,500 CHRCs × $52).

Thus, TSA estimates the total average annual cost to all respondents as a result of this collection will be approximately $3,917,680. The increase in the total annual cost burden from the previous (2002) ICR reflects the inclusion of additional respondents, which were previously excluded.

14. *Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, and other expenses that would not have been incurred without this collection of information.*

Part 1544 requires TSA to verify the information maintained by the respondents, as outlined above. An average verification is completed by a H band-level TSA TSI inspector, with a loaded mid-range salary of $43 per hour.

Table 6: Total Annual Cost to Federal Government

Information	Annual	Hour Burden	Cost Burden	Total

Collection	Respondents	per Respondent	Per Respondent	Annual Cost Burden
AOSSP Verification	71	25	$1,075	$76,325
TFSSP/PCSSP Verification	730	4	$172	$125,560
Total				**$201,885**

Verification is estimated to take an average 25 hours per respondent holding an Aircraft operator Standard Security Program (AOSSP). The cost to TSA to verify the information required of AOSSP respondents is thus $76,325 annually (71 operators × 25 hours × $43 loaded hourly wage).

Verification is estimated to take an average of four hours per year per respondent holding a TFSSP or PCSSP. The cost to TSA to verify the information required of these respondents is thus $125,560 (730 operators × 4 hours × $43 loaded hourly wage).

The total annual cost to the Federal government for this program is estimated to be approximately $201,885 annually.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

Since TSA's creation after September 11, 2001, TSA has obtained intelligence and threat information that requires implementation of additional security enhancements in order to protect the flying public. There has not been a change in the information that is being collected, however there has been an increase in the burden hours associated with the collection. The increase in burden hours is due to aircraft operators updating content in their security programs that pertain to recent threats and terrorist acts to the aviation industry (attempted Christmas bombing, attempted bombing in New York, etc.) Also, there has been a slight increase in the AOSSP population.

The process of maintaining and updating aircraft operator security plans was recalculated to more accurately reflect the time and effort the respondents are expending in order to comply with the security program requirement. Additionally, the increase in the total annual hour and cost burden reflects the inclusion of the CHRC requirements, and the TSA watch lists comparison and reporting requirement, which more accurately reflects the total annual hour and cost burden to respondents.

The 66 respondents listed in the previous ICR submission represent airlines holding a full AOSSP. These aircraft operators generally provide scheduled passenger service and tend to be larger companies. In addition to these respondents, TSA is adding 730 aircraft operators who hold either a TFSSP or a PCSSP. These aircraft operators typically provide on-demand air service and tend to be smaller companies. 49 CFR Part 1544 also governs recordkeeping requirements for aircraft operators holding a full All-Cargo Standard Security Program; however, their hour burden has been separately reported under OMB control number 1652-0040. Thus, the total number of respondents claimed under this information collection is 801.

16. *For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

TSA will not publish the results of this collection.

17. *If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

TSA is not seeking such approval.

18. *Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.*

TSA is not seeking any exceptions.